PART B APPLICATION REVIEW CHECKLIST

NAME OF FACILITY: McDonnell Douglas - Tract I
EPA I.D. NO.: MOD 000 818 963
LOCATION: St Louis, Mo
REVIEWED BY: SG Bud

TANK STANDARDS

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. No.	PERMIT COND. Cond. No.
Part 264, Subpart J regulations do not apply to facilities that treat or store hazardous waste in covered underground tanks that cannot be entered for inspection.					
1. DESIGN (SHELL THICKNESS) 264.191 Tanks must have sufficient shell strength and, for closed tanks, pressure controls (vents) to assure that they do not collapse or rupture. EPA shall require a minimum shell thickness be maintained at all times. (Factors to consider in establishing minimum thickness: width, height, and materials of construction of tank and specific gravity of waste to be placed in tank. In establishing minimum thickness EPA shall rely upon appropriate industrial design standards and other available information).		regulated tanks are opened or have unsealed cover. see 1/17/83 letter			
2. GENERAL OPERATING REQUIREMENTS 264.192 A. Wastes or other materials which are incompatible with the material of construction of the tank must not be placed in the tank unless the tank is protected from accelerated corrosion, erosion or abrasion through the use of: (i) Inner lining or coating which is compatible with the waste or material and is free of leaks, cracks, holes or deterioration. (ii) Alternative means of protection (e.g., cathodic protection or corrosion inhibitors).		no liners necessary construct of spec. material when necessary N/A			

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B. The permittee must use appropriate controls and practices to prevent overfilling, including: (i) Controls to prevent overfilling (e.g., waste feed cutoff system or bypass system to standby tank). (ii) For uncovered tanks, maintenance of sufficient freeboard to prevent overtopping by wave or wind action or precipitation.		interconnected tanks, spill over at certain level: loose cover to prevent wind and wave action			
3. INSPECTIONS 264.194 The permittee must inspect:					
A. Overfilling control equipment at least once each operating day.	overflow pipe or weir	* inspection not addressed in detail			
B. Data gathered from monitoring equipment, where present, at least once each operating day.	N/A				
C. For uncovered tanks, level of waste in the tank at least once each operating day for compliance with freeboard requirements.	loose cover				
D. Construction materials of above-ground portions of tank at least weekly to detect corrosion, erosion, or leaking.	plastic or concrete				
E. Area immediately surrounding the tank at least weekly to detect signs of leakage.					
F. Permittee must develop a schedule and procedure for assessing the condition of the tank. The schedule and procedure must be adequate to detect cracks, leaks, corrosion or erosion which may lead to cracks, leaks or		schedule for tank assessment			

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wall thinning. Procedures for emptying a tank to allow for entry and inspection must be developed when necessary to detect corrosion or erosion of tank sides and bottom. The frequency of assessment must be based on materials of construction, type of corrosion or erosion protection used, rate of corrosion or erosion detected previously and characteristics of waste. G. Part 264, Subpart D, Contingency Plan requires the permittee to specify procedures to be used to respond to spills or leaks including procedures and timing for removal of leaked or spilled waste and repair of the tank. (264.56) 4. CLOSURE 264.197 At closure all hazardous waste and hazardous waste residue must be removed from tanks, discharge control equipment and discharge confinement structures. 5. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES 264.198 Ignitable or reactive waste must not be placed in a tank unless: A. The waste is treated, rendered or mixed before or immediately after placement in the tank so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive and complies with 264.17(b); or		covered No ingitable or reactive in tanks (that are reg.) ↓			

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B. The waste is stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react; or C. The tank is used solely for emergencies. D. If the permittee treats or stores ignitable or reactive waste in covered tanks he must comply with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the "Flammable and Combustible Code - 1977or 1981."					
6. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES 264.199 A. Incompatible wastes or incompatible wastes and materials, must not be placed in the same tank unless 2 .17(b) is complied with. B. Hazardous waste must not be placed in an unwashed tank which previously held an incompatible waste or material unless 264.17(b) is complied with.		None in Regulated Tanks 			
7. TANK DESIGN REQUIREMENTS 122.25(b)(2) The permittee is required to include information on the following: A. References to design standards or other available information used in tank design and construction.	Not given	shell thickness no spec. 11/17/83 letter			

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B. Description of design specifications including identification of construction materials and lining materials.	Section D page D-18 thru D-24	material of const. compatable 1/17/83 letter			
C. Tank dimensions, capacity and shell thickness.	not given in all cases	given 1/17/83			
D. Diagram of piping, instrumentation and process flow.	not given in all cases	see drawings 8-5 8-6			
E. Description of feed systems, safety cutoff, bypass systems and pressure controls.	not adequate	1/17/83 letter			
F. Description of procedures for handling incompatible, ignitable or reactive wastes including the use of buffer zones. (NOTE: Containment systems are not required)	Section D satisfactory	no ignitable reactive or incompatable waste in tabs			